KAREN E. BEZNER, ESQ.

567 Park Avenue, Suite 103 Scotch Plains, New Jersey 07076 (908) 322-8484 Attorney for Karen E. Bezner, Trustee Karen E. Bezner KB 5770

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

In the Matter of:

In Proceedings for Liquidation under Chapter 7 of the Bankruptcy Code

COASTAL CONSTRUCTION GROUP, LLC,

Hon. Michael B. Kaplan, C.U.S.B.J.

Debtor.

Bankruptcy No. 24-15203

NOTICE OF MOTION FOR ORDER AUTHORIZING SALE OF REAL PROPERTY FREE AND CLEAR OF ALL LIENS, MORTGAGES AND OTHER ENCUMBRANCES SUCH LIENS, MORTGAGES, AND OTHER ENCUMBRANCES AS ARE PROVEN VALID TO ATTACH TO THE PROCEEDS OF SALE PURSUANT TO 11 U.S.C. SECTION 363(b) and (f)

TO: Office of the United States Trustee One Newark Center Suite 2100 Newark, New Jersey 07102

> Maggie McGee, Esq. Office of the United States Trustee One Newark Center, Suite 2100 Newark, New Jersey 07102

Coastal Construction Group, LLC 235 Hickory Lane Unit B Bayville, New Jersey 08721 Debtor

Daniel E. Straffi, Esq. Straffi & Straffi, LLC 670 Commons Way Toms River, New Jersey 08755 Counsel for the Debtor

Casey Quinn Re/Max at Barnegat Bay 221 Lacey Road Forked River, New Jersey 08731 Listing Broker Irene Shepard Caplan Realty Assoc., LLC 2008 Route 37 East Toms River, New Jersey 08753 Selling Broker for 427 and 429 Boxwood Drive

Gregory J. Hock, Esq. D'Arcy Johnson Day, P.C. 204 Court House Lane Toms River, New Jersey 08753 Closing Attorney For Debtor

John Mensching, Esq. Mensching & Lucarini, P.C. 1200 Hooper Avenue, 2nd Floor Toms River, New Jersey 08753 Closing Counsel For Purchasers

Wrazen Homes, LLC 3062 Wilbur Avenue Manchester, New Jersey 08759 Proposed Purchaser

Michael A. Alfieri, Esq. 30 Freneau Avenue Matawan, New Jersey 07747 Counsel for AVB Investment, LLC

PLEASE TAKE NOTICE THAT the undersigned counsel for Karen E. Bezner, Chapter 7 Trustee shall move before the Honorable Michael B. Kaplan, C.U.S.B.J. at the United States Bankruptcy Court, United States Courthouse, 402 East State Street, Trenton, New Jersey for an order, authorizing sale of the real property at 429 Boxwood Drive and 427 Boxwood Drive, Forked River, New Jersey to Wrazen Homes, LLC for the respective purchase prices of \$161,000.00 and \$175,000.00, said sale to be conducted free and clear of all liens, mortgages, and other encumbrances, such liens, mortgages, and other encumbrances as are proven valid to attach to the proceeds of sale pursuant to 11 U.S.C Section 363(b) and (f).

PLEASE TAKE FURTHER NOTICE THAT in support of the within application, the undersigned shall rely upon the Certification of Karen E. Bezner, Trustee and Memorandum of Law, submitted herewith. As required by local rule, a proposed form of order is submitted herewith.

Case 24-15203-MBK Doc 64 Filed 02/11/25 Entered 02/11/25 15:34:59 Desc Main Document Page 3 of 3

PLEASE TAKEN FURTHER NOTICE THAT your response, if any, to the motion is due

seven (7) days prior to the date scheduled for hearing thereon. Your response must be filed with the

Clerk of the Bankruptcy Court, United States Courthouse, 402 East State Street, Trenton, New Jersey

08608 and served upon counsel for the Trustee. In the event that no timely response is filed and

served, the Bankruptcy Court may grant the relief requested by the moving party without need for

further hearing.

KAREN E. BEZNER, ESQ.

Counsel for Karen E. Bezner, Trustee

By: <u>/s/ Karen E. Bezner</u> Karen E. Bezner

Dated: February 11, 2025

- 3 -